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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

GEORGE COLLINS, et al.,

Case No. 16-cv-05629-EMC

## Plaintiffs,

**STIPULATION AND [PROPOSED]  
ORDER TO AMEND CASE  
MANAGEMENT AND PRE-TRIAL  
ORDER FOR JURY TRIAL**

## COUNTY OF SAN MATEO, et al.,

### Defendants.

## **RECITALS**

The parties, through counsel, appeared on 10/3/17 for a Scheduling Conference with the Court. As a result, the Court filed a Case Management And Pre-Trial Order For Jury Trial (Dkt. 58 – “Pre-Trial Order”) specifying typical pre-trial orders regarding discovery cut-off dates, expert report exchange dates, trial, etc.

Counsel consulted thereafter, and based on a significant travel plan of Defendants' Counsel Mr. Levy in the month of May 2018, and a rather difficult alignment in the original Pre-Trial Order of the opening Expert Reports being due the same date as the Fact Discovery Cut-off (4/19/18), Counsel are jointly stipulating, and asking this Court to agree to amend the Pre-Trial Order as set forth in the attached submission (Exhibit A) of a completed and ready-

1 for-filing version of an Amended Case Management And Pre-Trial Order For Jury Trial.

2 In the attached version, the following changes were made;

3 1 – The Non-Expert Discovery Cut-off moved from 4/19/18 to 3/9/18

4 2 – Exchange of Expert opening reports moved from 4/19/18 to 3/23/18

5 3 – Exchange of Expert rebuttal reports moved from 5/10/18 to 4/13/18

6 4 – Expert Discovery Cut-Off moved from 5/31/18 to 5/3/18

7

8 **IT IS SO STIPULATED**

9

10 Dated: October 24, 2017

11 \_\_\_\_\_  
12 Robert R. Powell

13 Attorney for Plaintiffs

14 Dated: October 24, 2017

15 \_\_\_\_\_  
16 David A. Levy

17 Attorney for Defendants

18 Pursuant to L.R. 5-1(i)(3), the filer of this document  
19 attests that he has received the concurrence of this  
20 signatory to file this document.

21

22 **[PROPOSED] ORDER**

23 The Court hereby adopts the Stipulation of the parties hereinabove, and orders the  
24 Amended Case Management And Pre-Trial Order For Jury Trial as attached to this Stipulation  
25 be signed and filed, replacing the Pre-Trial Order at Docket #58, as the operative Case  
26 Management And Pre-Trial Order For Jury Trial.

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28 **IT IS SO ORDERED**

Dated: October 25, 2017



HON. EDWARD M. CHEN  
U.S. DISTRICT COURT JUDGE